

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

Case No.: 12-1018

Lower Case No.: NLRB-07-CA-53182

Wellington Industries, Inc.,

Petitioner

v.

National Labor Relations Board,

Respondent

Independent Union Local One, an
affiliate of Local 174, International
Union, United Automobile, Aerospace
and Agricultural Implement Workers of
America, AFL-CIO,

Intervenor

**INTERVENOR INDEPENDENT UNION LOCAL ONE,
AN AFFILIATE OF LOCAL 174, INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE AND AGRICULTURAL IMPLEMENT
WORKERS OF
AMERICA (UAW), AFL-CIO'S MOTION FOR INTERVENOR TO SPLIT
ORAL ARGUMENT TIME ALLOTMENT WITH RESPONDENT**

NOW COMES Independent Union Local One, an affiliate of Local 174, International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW), AFL-CIO (hereinafter “Local One”) by and through its attorneys, Miller Cohen, P.L.C., and for its Motion for Intervenor to Split Oral Argument Time Allotment with Respondent:

1. Local One is an Intervenor in this case and is the party of interest in the action before the National Labor Relations Board as the charging party.

2. Oral argument is set for this matter on March 6, 2015. On March 2, 2015, the Court issued an Order allotting ten minutes to the Petitioner and 10 minutes to the Respondent. The Order indicates that only one party per side may argue.

3. Counsel for the Respondent National Labor Relations Board and Intervenor have discussed and agreed to share the time allotted to Respondent.

4. The Board does not oppose this motion and is willing to share 3 minutes of its designated 10 minutes of argument time to provide Intervenor’s counsel an opportunity to present argument.

WHEREFORE, Local One respectfully requests that this Honorable Court grant its Motion for Leave to Intervene.

Respectfully submitted,

MILLER COHEN, P.L.C.

By: /s/Robert D. Fetter

Robert D. Fetter (P68816)

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Dated: March 3, 2015

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **MOTION FOR INTERVENOR TO SPLIT ORAL ARGUMENT TIME ALLOTMENT WITH RESPONDENT** is being served upon all parties in this case by filing a copy of the same with this Court's Electronic Case Filing (ECF) system, which will provide electronic service on

all counsel of record in this case, as allowed by the Federal Rules of Appellate Procedure, D.C. Cir. Rule 25(c), and this Court's May 15, 2009 Administrative Order ECF-2(D). Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system:

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Respectfully submitted,
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By: /s/Robert D. Fetter
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Dated: March 3, 2015